



December 16, 2016

**VIA ECFS**

Mr. Eliot Greenwald  
Disability Rights Office  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554  
Email to [TRSreports@fcc.gov](mailto:TRSreports@fcc.gov) and [Eliot.Greenwald@fcc.gov](mailto:Eliot.Greenwald@fcc.gov)

***Subject: Confidential Treatment  
Purple Communications, Inc. Annual Report 64.606(g)  
CG Docket 03-123***

Dear Mr. Greenwald:

Pursuant to Section 64.606(g) of the Commission's rules, Purple Communications, Inc. ("Purple") submits its Annual Report on compliance with the mandatory minimum standards established for Internet-Based TRS providers under Section 64.604 of the Commission's rules. Purple is also submitting an electronic copy of the redacted version in the above-captioned docket in the ECFS.

Also pursuant to 47 C.F.R. § 0.459, Purple Communications, Inc. ("Purple") hereby requests confidential treatment for the confidential portions of the attached report. These portions of the report contain company-specific, proprietary commercial information that is not routinely available for public inspection and is safeguarded from competitors. Accordingly, it should be protected from disclosure pursuant to 47 C.F.R. § 0.457(d) and Exemption 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4). Below please find a statement of the reasons for withholding the materials from inspection as well as relevant facts surrounding this request.

**1. Identification of the specific information for which confidential treatment is sought** – Purple requests that the pages of the attached report that are marked "CONFIDENTIAL, NOT FOR PUBLIC INSPECTION" and that are redacted in the public version of the report be treated as confidential.

**2. Identification of the Commission proceeding in which the information was submitted or a description of the circumstance giving rise to the submission** – Purple is providing this information to the Commission to satisfy its annual reporting requirement.

**3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged** – The information at issue is highly confidential and specific to Purple. It details information related to Purple's internal business operations, practices, and structure that would cause harm to Purple if disclosed. This information is sensitive for competitive reasons. It is safeguarded from competitors and is not made available to the public. If this information is not protected, other providers may utilize it to compete against Purple more effectively.

**4. Explanation of the degree to which the information concerns a service that is subject to competition** – This information concerns relay service, a service that is subject to substantial competition.

**5. Explanation of how disclosure of the information could result in substantial competitive harm** – The disclosure of this information could cause substantial competitive harm to Purple. Because other providers would have access to significant information regarding Purple's business, operational and market details, they could use that information to compete more effectively against Purple and undermine Purple's position in the marketplace.

**6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure** – Purple routinely treats this information as highly confidential and takes significant care to ensure that it is not disclosed to its competitors.

**7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties** – Purple does not make this information available to the public, and this information has not been previously been disclosed to third parties.

**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure** – Purple requests that this information be treated confidential on an indefinite basis because it cannot identify a certain date at which this information could be disclosed without causing competitive harm to Purple.

If a request is submitted for disclosure of this information, please provide sufficient notice to the undersigned to allow Purple to take appropriate steps to safeguard the confidentiality of the information. In addition, should this request for confidentiality be denied, Purple requests that this information be returned by the Commission without consideration.

If there are any questions regarding this request, please do not hesitate to contact me or Mike Strecker.

Sincerely,

/s/

Lydia Yomogida  
Senior Manager Legal and  
Compliance Director

cc: Mike Strecker, Vice President Regulatory